

JUROR # _____

Judge Chen's Order: **Voir Dire**. In a jury trial, the Court will conduct a voir dire based on the attached (or a similar) questions/subjects. Counsel may also submit for the Court's consideration an agreed upon set of additional voir dire questions to be posed by the Court. Any voir dire questions on which counsel cannot agree may be submitted separately. Counsel will be allowed a brief (15 minutes) follow-up voir dire after the Court's questioning.

Judge Chen Standard Questions/Subjects:

1. Name.
2. City of residence.
3. Occupational status.
4. Organizations.
5. Hobbies.
6. Marital status.
7. Spouse's occupation.
8. Children (including ages).
9. If a juror on another case.
10. If ever a grand juror.
11. If ever in the military.

Plaintiffs' Additional Proposed Questions/Subjects:

12. What experience do you have investing in stocks?
13. Do you own or have you ever owned stock in Tesla?
14. What, if anything, do you use Twitter for?
15. Which websites, social media platforms, newspapers, television channels, and/or radio stations do you get your news?
16. What experience, if any, do you have with: the federal securities laws; corporate finance; or private equity?
17. What opinions do you have about class action lawsuits, if any?
18. Have you had any education or experience in business or accounting?
19. Have you ever been involved in any type of legal proceeding?
20. Have you, or has anyone close to you, worked for Tesla or been involved in the electric vehicle business?
21. Are you, or is anyone close to you, involved in the securities industry?
22. Under the law, corporations and individuals are treated equally. Will anyone here have difficulty following that law or has objections to that law?
23. Do you now, or have you ever, owned a Tesla? (*Defendants object to this question*)

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Defendants' Additional Proposed Questions/Subjects:

24. What do you think about Tesla?
25. What do you think about Elon Musk?
26. Do you use social media? Twitter? If yes, how often?
27. If a business understanding isn't memorialized in an agreement would that cause you to doubt its existence?
28. Have you ever had to make an important split-second decision?

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PRELIMINARY MATTERS

1. The trial in this case may last approximately three (3) weeks, or even longer. The jury will generally sit four (4) days per week (Mondays, Tuesdays, Wednesdays, and Fridays), potentially from 8:30am to 2:00pm, during that time. Jury service is one of the highest duties and privileges of a citizen of the United States. Mere inconvenience or the usual financial hardship of jury service will be insufficient to excuse a prospective juror. Do you wish to apply to the Court to be excused on the ground that jury service would be a serious hardship?

Yes No If Yes, please explain the hardship: _____
_____.
_____.

2. Do you have any condition or issue that would affect your ability to serve as a juror, including difficulty hearing, seeing, reading, or concentrating?

Yes No

If you feel you could serve with accommodations, please indicate the accommodations:

_____.
_____.

3. Have you been vaccinated against COVID-19 or are you scheduled to be vaccinated?

Yes No

4. Do you have any difficulty reading or understanding English?

Yes No If Yes, please explain: _____
_____.

BACKGROUND

5. Name: _____

6. Are you: Male, Female, or Non-Binary / Other

7. Age: _____

8. Residence:

a. County: _____ City/Town: _____

b. How long have you lived at that location? _____

c. Your place of birth: _____

d. Do you own or rent your home? Rent Own Other

9. What is your marital status? _____

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10. What is your current job status? _____

11. Occupation: [PLEASE NOTE: If you are currently not employed, retired, disabled or a homemaker, please describe your most recent prior employment]

a. What is your current or, if unemployed, most recent occupation? _____

b. By whom are (were) you employed? _____

c. How long have (did) you worked there? _____

d. Please describe the nature/duties of your job. _____

_____.

12. Please describe your educational background:

School Name

Major areas of study

Degrees received

_____.

13. Have you taken any courses or had training in law, legal procedure, or administration of justice?

____ Yes ____ No If Yes, please explain: _____

14. Please complete the following questions regarding your **present spouse/partner**. If you are widowed, divorced, or separated, please answer regarding your **former spouse/partner**.

a. What is his/her occupation (or what was it, if retired or unemployed or disabled)?

b. By whom is (was) s/he employed? _____

c. How long has (did) s/he worked there? _____

d. Please describe the nature of his/her job, was it management or supervisorial?

e. What other types of jobs has s/he had in the past?

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15. If you have children, please state:

Sex	Age	Education	Occupation or Year in School

16. Have you or anyone close to you received any training, experience, or specialized knowledge or worked in any of the following? Please check the box that applies and provide an explanation below:

Sector	Yes, Me	Yes, Family Member	Yes, Someone Close to Me	No
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The federal securities laws and regulations?

Corporate Finance

Investing; Private Equity; Startups' Venture Capital

Electric vehicles

Rockets/Space Exploration

If you indicated Yes with a check mark to any of the above, please provide detail:

_____.

17. Do you or your partner have any experience investing in stocks, whether investing money for yourself or someone else?

____ Yes ____ No If Yes, please explain: _____
 _____.

18. Do you own the stock or securities of any company?

____ Yes ____ No If Yes, what stocks or securities: _____
 _____.

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19. Have you ever lost a significant amount of money in the stock market?

Yes No If Yes, please explain: _____
_____.

20. Have you ever bought or sold Tesla stock and/or other securities?

Yes No If Yes, please explain: _____.

MEDIA

21. What are your main sources of news/current events? Please list those that fall into the categories below. If you need more space for any category or other answer, please use additional lines below.

Newspapers: _____

Social Media: _____

Television: _____

Radio: _____

Internet: _____

Conversations: _____

Other: _____

22. Have you commented on, “liked,” posted or, tweeted anything on social media about or relating to Elon Musk or Tesla?

Yes No If Yes, please explain: _____
_____.

23. Do you have a Twitter account? Yes No

a. If Yes, do you follow Elon Musk on Twitter? Yes No

b. If Yes, when did you create your account? _____

24. Will anything you described above affect your ability to be fair and impartial to both sides in this case?

Yes No If Yes, please explain: _____
_____.

FAMILIARITY WITH THE CASE

25. Do you know or have you heard about the defendant, Elon Musk?

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Yes No If Yes, please explain how you know Mr. Musk, or what you have heard about him, and the source of anything you know or have heard about him:

26. Do you have familiarity with or have you heard about Elon Musk, Tesla, or this case?

Yes No If Yes, please explain what you know/have heard and the source:

27. Have you or anyone close to you ever been employed by or applied to work at Tesla?

Yes No If Yes, what were the positions and approximate dates of employment:

28. Do you or to your knowledge do your friends or family members have strong opinions or feelings about either Elon Musk or Tesla, that would influence your ability to be a fair and impartial juror in this case?

Yes No If Yes, please explain: _____

29. A list is attached to the end of this questionnaire. Please circle the name of any of the listed people that you personally know.

Please explain how you recognize or know the individual(s) whom you have circled:

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EXPERIENCE WITH LEGAL SYSTEM30. Have you previously served as a trial juror or as a grand juror? Yes No

If Yes, please complete for each case on which you served: Civil or Criminal

	Nature of case (i.e., robbery or personal injury)	When/Where?	Verdict reached? (yes or no)
1			
2			
3			

31. Do you have any opinions about class action lawsuits?

Yes No If Yes, please explain: _____
_____.

32. Have you ever been personally involved in a class action lawsuit?

Yes No If Yes, please explain: _____
_____.

33. Do you belong to any group or organization that favors tort reform, like limiting the amount of money a jury can award to a plaintiff in a civil lawsuit?

Yes No If Yes, please explain: _____
_____.

34. Have you or anyone close to you ever suffered a substantial monetary loss because of a financial investment, including stocks, real estate, or business?

Yes No If Yes, please explain: _____
_____.

35. If you are selected as a juror in this case, the court will instruct you on the applicable law and your duties as jurors. Will you be able to follow these instructions even if you disagree with them?

Yes No If Yes, please explain: _____
_____.

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36. As a juror it is important that you do not obtain information about this case outside of the courtroom. The Court will instruct you that: Because you will receive all the evidence and legal instruction you properly may consider to return a verdict: do not read, watch, or listen to any news or media accounts or commentary about the case or anything to do with it, do not do any research, such as consulting dictionaries, searching the Internet or using other reference materials; and do not make any investigation or in any other way try to learn about the case on your own. Do not visit or view any place discussed in this case, and do not use the Internet or any other resource to search for or view any place discussed during the trial. Also, do not do any research about this case, the law, or the people involved—including the parties, the witnesses or the lawyers—until you have been excused as jurors. If you happen to read or hear anything touching on this case in the media, turn away and report it to me as soon as possible. Will you be able to follow this instruction?

____ Yes ____ No If Yes, please explain: _____
_____.
_____.

37. Judge Edward M. Chen will preside over this trial. His courtroom deputy is Ms. Vicky L. Ayala. Do you know Judge Chen or any members of his staff?

____ Yes ____ No If Yes, please explain: _____
_____.
_____.

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JUROR OATH

I declare under penalty of perjury that the answers set forth in this Jury Questionnaire are true and correct to the best of my knowledge and belief. I have not discussed the questions or my answers with others. I have not received assistance in completing this questionnaire.

Signature: _____

Print Name: _____

Date: _____

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Further Explanation Sheet

(Please put the question number next to your response. Thank you)

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LIST OF INTERESTED INDIVIDUALS

Elon Musk

Brad W. Buss

Robyn Denholm

Ira Ehrenpreis

Antonio J. Gracias

James Murdoch

Kimbal Musk

Linda Johnson Rice

Glenn Littleton

Timothy Fries